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In Re

UNITED STATES BANKRUPTCY COURT

Trudy D. Johnson

FOR THE DISTRICT OF NEW JERSEY
Chapter 13
Case No. 17-10692

Debtor(s)

RESPONSE TO OBJECTION FILED BY
TRUSTEE

HEARING DATE: 5/23/2017

Trudy D. Johnson, Debtor(s), through undersigned counsel, files this limited response and opposition ("Response") to Objection filed by Albert Russo , Trustee and in support of this Response, respectfully states as follows:

BACKGROUND

1. On January 12, 2017 ("Petition Date"), the Debtor filed with this Court a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
2. A 341a Meeting of Creditors was held on May 11, 2017.
3. The Confirmation hearing is scheduled on May 23, 2017.

DEBTORS RESPONSE AND OPPOSITION

4. Albert Russo, Trustee, filed an Objection in this case on May 12, 2017 (Document No. 26) with the reason substantially as follows:

- a. The debtor has failed to supply the following documents:
 - i. 2016 Tax Return
 - ii. 401k Loan Statement
 - iii. Amendments to Schedules B/C to contain property is more descriptive terms.
5. The items listed in 4(a)(i)-4(a)(ii) of this response have been supplied to the Trustee as of this date.
6. Amendments to schedules B/C were filed with the Court on May 12, 2017 and are reflected as Document 27 on the Docket.

WHEREFORE, Debtor(s) pray this Honorable Court confirms the Debtor's plan notwithstanding the objections filed by the Trustee.

Dated: 5/15/2017

By: /s/ Warren S. Jones, Jr.

WARREN S. JONES, JR., ESQUIRE

Counsel for Debtor